REMARKS

Claims 1 through 78 are pending in the present application. Claims 1, 7, 8, 9, 10, 17, 18, 19, 20, 26, 27, 28, 29, 35, 36, 37, 38, 44, 45, 46, 47, 55, 56, 57, 58, 65, 66, 67, 68, 75, and 77 are independent claims. Applicant proposes adding claims 79 and 80, which depend from claim 1, and independent claim 81.

All pending claims stand rejected under 35 U.S.C. § 103(a).

Reconsideration is respectfully requested in view of the following remarks.

Rejections Under 35 U.S.C. § 103

Claims 1, 3-10, 12-20, 22-29, 31-38, 40-49, 51-59, 61-69 and 71-78 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over US Patent No. 6,668,322 B1 (hereinafter "Wood") in view of US Patent 6,035,404 (hereinafter "Zhao"). Claims 2, 11, 21, 30, 39, 50, 60 and 70 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Wood in view of Zhao and US Patent No. 6,226,752 (hereinafter "Gupta").

Applicant respectfully submits that the Office cannot meet its legal burden to establish a prima facie case of obviousness of the amended claims under 35 U.S.C. § 103(a) based upon the cited references. Reconsideration is respectfully requested.

In the patent specification, Applicant notes several features of existing systems:

> The statelesss nature of Hyper-Text Transfer Protocol (HTTP) is a disadvantage of any web application that runs on a server computer connected to a network and which uses HTTP to communicate with client web browsers. This is because the HTTP protocol is generally a stateless request/response protocol. That is, *for every request generated by a user, the web application provides a response which typically includes* ***one or more variables used by the application to identify the user and/or the session***. In order to accomplish user and/or session management, these variables are returned with a subsequent request by the user. Without that, the HTTP protocol does not inform the server whether a series of consecutive requests are coming from the same web browser and/or user or different web browsers and/or users.
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> . . .

> For any web application which uses HTTP protocol to communicate with a web browser, it is very important to ascertain whether consecutive requests come from the same web browser and/or user. To enable session as well as user management, prior web applications were designed to send one or more cookies as part of an initial response to a web browser. In turn, a web browser was required to return one or more cookies as part of the subsequent request.
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> . . .
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> [B]oth software libraries and session objects have also been used to enable web applications to manage different users and/or sessions. The first approach provides ***two variables to a web application for each request to identify the session and user***. The web application can then use either hash tables in memory, files on a file system or tables in a database system to keep the application states associated with each session and user.

In contrast to these existing methods wherein *multiple* variables are used to identify the session and user, Applicant discloses performing user and session management wherein requests for an application instance "includes a **single** identifier for all requests from the user **without further user and session application variables**."

Amended claim 1 recites as follows:

> A computer-implemented method for performing user and session management over a computer network, comprising:
>
> receiving in a first session a first request from a user for an application instance, **the first request comprising a single random number that uniquely identifies both a session and a user without additional user and session application variables**; and
>
> transmitting an application instance response to the user based on stored user and session system information.

In order to establish a prima facie case of obviousness, the references must teach **all** of the recited claim language and teach combining the references to form the recited combination. *See* M.P.E.P. § 2143.03 ("[t]o establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art.") Applicant respectfully submits that

Wood and Zhao do not teach the claim language **emphasized** above, and, therefore, cannot possibly suggest the recited combination.

In the Decision on Appeal, the Office *has acknowledged* that Zhao does not disclose the previously recited claim language of "the request including a single identifier used to identify both a session and a user for all user requests without further user and session application variables." ("We agree with the Appellant's contention that Zhao does not teach the argued limitation.") (Decision on Appeal at p. 7). Accordingly, Zhao similarly does not disclose the amended claim language which recites:

> **the first request comprising a single random number that uniquely identifies both a session and a user without additional user and session application variables.**

The Board cited to Wood as allegedly relevant to the previously existing claim language. Applicant respectfully submits that the amended claim language distinguishes from the recited language. Wood teaches a system of the type that Applicants sought to improve upon. In particular, Wood teaches using ***two separate identifiers***, "session id" and "principal id," to identify a session and a user. (Wood, col. 8, ll. 9-25). Wood also describes that there are *additional* user session and application variables, namely, "a trust level, group ids, a creation time, and expiration time."

In contrast with amended claim 1, Wood does not disclose "**the first request comprising a single random number that uniquely identifies both a session and a user without additional user and session application variables."** Wood discloses a method wherein a user request includes a session token. (Col. 10, ll. 30-36). According to Wood, the session token comprises a session id, a principal id, a trust level, group ids, a creation time and an expiration time.(Col. 8, ll. 9-12). But in contrast with the recited claim language, the session token as defined by Wood is not "**a single random number that uniquely identifies both a session and a user without additional user and session application variables**." Indeed, a session token comprising a session id, a principal id, a trust level, group ids, etc is not "a **single** random number" at all. Certainly, the session id, principal id, a trust level, group ids, etc. are not "a

single random number that **uniquely identifies both a session and a user**." Moreover, the session token of Wood comprising a session id, principal id, a trust level, group ids, etc. is not "a single random number that uniquely identifies both a session and a user **without additional user and session application variables**." Rather, the session token as disclosed by Wood is comprised of several variables relating to the user and session.

Indeed, Wood **actually teaches away** from combining to form the recited combination. At column 8, lines 9-25, Wood describes using *two separate identifiers* within a session to identify the session and the user. In particular, Wood teaches using "session id" and "principal id." Also, Wood describes that there are additional user session and application variables, namely, "a trust level, group ids, a creation time, and expiration time." In Wood, the trust level is associated with the unique principal id and "serves as a basis for evaluating whether a *principal* associated with the session credentials has been authenticated to a sufficient level…" (emphasis added) (Col. 8, lines 26-30). If the same id were used for the session and user, it would not be possible to evaluate user authentication using the trust level, as required by Wood. Modifying Wood to include the "single identifier" and not a trust level would render Wood unsatisfactory for this intended purpose. Accordingly, Wood actually teaches away from a combination such as that recited in claim 1.

Therefore, because the cited references do not teach or suggest the emphasized language, even in combination the references do not disclose or suggest the combination recited in claim 1. The Office cannot establish a prima facie case of obviousness of the amended claims under 35 U.S.C. § 103(a) based upon the cited references. The other independent claims, while their claim language is different from that of claim 1, are novel and non-obvious for reasons similar to those discussed above.

Reconsideration and withdrawal of the rejections under 35 U.S.C. § 103 is respectfully requested.

CONCLUSION

The undersigned respectfully submits that pending claims are allowable and the application in condition for allowance. A Notice of Allowance is respectfully solicited.

Examiner Wood is invited to call the undersigned in the event a telephone conference would advance prosecution of this application.

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